

Received & Inspected

DEC 18 2013

FCC Mail Room

COMMONWEALTH OF
PUERTO RICOThe Telecommunications Regulatory Board of Puerto Rico
Office of the Chairman

December 6, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Re: Broadband Adoption Lifeline Pilot Program; *Lifeline and Link Up Reform and Modernization*, WC Docket 11-42

Dear Ms. Dortch:

The Telecommunications Regulatory Board of Puerto Rico ("The Board"), hereby requests the withdrawal of its Petition to opt out of the National Lifeline Accountability Database filed in Docket No. 11-42. ("Petition").

The Board previously sought a waiver from participating in the National Lifeline Accountability Database ("NLAD") because it had implemented a parallel database that satisfied the specific functionality requirements enumerated in the Lifeline Reform Order,¹ by: (1) ensuring that all ETCs in Puerto Rico obtain duplicative support verification for a Lifeline subscriber prior to receiving reimbursement for providing the Lifeline discount; (2) scrubbing duplicates from the Lifeline rolls; (3) preventing ETCs from signing up individuals or households that are already receiving a Lifeline benefit; (4) standardizing and verifying addresses submitted to the system; (5) verifying a subscriber's identity at the time a system query is made; (6) including a dispute resolution process to ensure that subscribers are not wrongfully denied benefits; (7) receiving and processing information including the name, address and phone number of each Lifeline subscriber; (8) managing "exceptions" to the definition of "duplicative support" and providing rules for dealing with situations, such as non-standardized addresses, that may not be able to be resolved through mechanized means; (9) retaining all data related to consumers who have received Lifeline and Link Up for ten years, after the consumer receives Link Up or de-enrolls from Lifeline; and (10) including safeguards to ensure that the data in the system is only used to

¹ See Lifeline Reform Order, 27 FCC Rcd at 6752, ¶¶ 212-220.



check for duplicative support and related functions and for no other purpose, including marketing or subscriber retention.

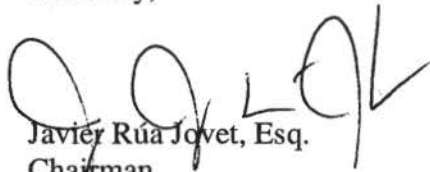
At the time that the Board filed its Petition, it identified a functional requirement – the ability to receive updates from ETCs both in real-time and in periodic batches – that was still under development. ETCs in Puerto Rico could update the database of new individual subscribers in real time; but the functionality to modify subscriber information in batches was not scheduled to be available until 2013. In addition, FCC and USAC access to records for oversight and for audits would be supported solely via the provision of reports on an as-needed basis. There was no application programming interface (API) that would allow the FCC and USAC to directly access or receive data.

In the intervening months, the Board has identified impediments to implementing these outstanding functional requirements caused primarily by cuts to the Board's budget, which has been sharply reduced year-over-year. Because significant programming efforts are still required to complete the implementation of batch processing and the API, the budget cuts are fatal to the Board's ability to accomplish the remaining steps necessary to make the Puerto Rico database fully compliant with the Lifeline Reform Order.² Faced with these insurmountable obstacles, the Board seeks to withdraw its Petition to Opt Out of the Lifeline Database.

The Board is aware that Puerto Rico will not be migrated onto the national database until Spring 2014 and that intervening steps to resolve data field incongruities must occur before the migration can be successful. The Board commits to maintaining the current Puerto Rico database to retain its ability to eliminate and prevent duplicates in the Lifeline rolls until such time as Puerto Rico has been successfully migrated to the national system. Moreover, the Board is committed to working closely with the Commission to reconcile the format variances between Puerto Rico addresses and surnames and the format used in the national database.

Please direct any questions as to this matter to the undersigned.

Cordially,


Javier Rúa Jovet, Esq.
Chairman

² *Lifeline and Link Up Reform and Modernization et al.*, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012), ¶ 221 (Lifeline Reform Order).